

**From:** Franz, Michael <Michael.Franz@lewisbrisbois.com>  
**Sent:** Tuesday, November 22, 2022 3:45 PM  
**To:** Joanna Butterworth; Jerry Pignato  
**Cc:** Matt Kane; Sarah Ramsey; Daniel Webber; Schrag, Jeremy; Rodney Stewart; ddozier@stewartlaw.com  
**Subject:** RE: Farmers Mutual v HL Motor Group

We do not have any medical records for our client but have subpoenaed records and will disclosed them upon receipt.

Thanks,



**Michael T. Franz**  
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**From:** Joanna Butterworth <jbutterworth@ryanwhaley.com>  
**Sent:** Tuesday, November 22, 2022 12:38 PM  
**To:** Franz, Michael <Michael.Franz@lewisbrisbois.com>  
**Cc:** Jerry Pignato <jerry@ryanwhaley.com>; Matt Kane <mkane@ryanwhaley.com>; Sarah Ramsey <SRamsey@ryanwhaley.com>; Daniel Webber <dgw\_attorney@outlook.com>; Schrag, Jeremy <Jeremy.Schrag@lewisbrisbois.com>; rstewart@rstewartlaw.com; ddozier@stewartlaw.com  
**Subject:** [EXT] Farmers Mutual v HL Motor Group

From Jerry Pignato –

Mr. Franz,

Thank you for providing us with your client's Rule 26 Initial Disclosures in the above case. You provided a number of insurance documents, but no medical records were provided. Do you have any medical records that address your client's contention he blacked out at the time of the accident? If so, I would greatly appreciate receiving copies of those records. Please let me know. Thank you.

Jerry



**Gerard F. Pignato**

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